

LIABILITY COMPANY

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February 26, 2010

### Via Certified Mail

Marlene Dortch Secretary Federal Communications Commission 445 12th Street, SW Suite TW-A325 Washington, D.C. 20554

**Re:** 2010 Annual CPNI Certification for A+ Conferencing LTD.

Dear Ms. Dortch:

On behalf of A+ Conferencing LTD., enclosed please find the company's 2010 Annual CPNI Certification pertaining to the 2009 calendar year.

Please contact me at (202) 857-4506 if you have any questions regarding this filing.

Respectfully submitted,

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Jennifer M. Kashatus

Attachment

cc: Best Copy & Printing, Inc. (via email: FCC@BCPIWEB.com)

# Annual 47 C.F.R. § 64.2009(e) CPNI Certification

## EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2010

Date Filed: 2/26/2010

Name of company covered by this certification: A+ Conferencing LTD.

Form 499 Filer ID: 827276

I, Staci Burns, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions against data brokers in the past year. The company does not have any information regarding processes pretexters are using to attempt to gain access to CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may be subject to enforcement action.

Signed: Staci Burns

COO

### ATTACHMENT A

## A+ Conferencing CPNI Procedure Summary for 2010

A+ Conferencing exclusively provides audio bridge conferencing services to requesting customers. A+ Conferencing has established policies and procedures that are designed to ensure that it is in compliance with the Federal Communications Commission's ("Commission") rules regarding the use, disclosure, and access to CPNI. A+ provides this statement summarizing those procedures in accordance with section 64.2009(e) of the Commission's rules, 47 C.F.R. § 64.2009(e).

<u>CPNI Certification</u>: A+ has appointed an officer who is responsible for overseeing the company's compliance with the FCC's CPNI rules. The officer will ensure that the company files an annual CPNI certification.

Permissible Uses of CPNI: A+ is committed to protecting its customers' privacy, and it limits the situations in which CPNI may be used, access, and/or disclosed. In accordance with the Commission's rules, A+ may use CPNI for the following purposes: (1) to initiate, provide, render, and bill and collect for the telecommunications services from which such information is derived; (2) to provide the services necessary to, or used in, the provision of the services that A+ provides to its customers; (3) to market services to customers within the category of service to which the customer already subscribes; and (4) to protect our rights and property, or to protect our customers and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, our services. We also may use CPNI to provide any inbound telemarketing, referral, or administrative services to the customer for the duration of the call, if the customer initiated the call and approves of the use of such information to provide services.

A+ has implemented protections, such as contractual protections, to protect against unauthorized disclosure or access to CPNI in the limited instances where it is required to share or disclose CPNI with third parties, such as for billing and collection.

Employee Training: A+ trains its personnel regarding when they are and are not permitted to use, disclose, and/or permit access to CPNI. A+ has an express disciplinary process in place for the misuse of CPNI, which includes the potential for termination.

<u>Customer Access to CPNI</u>: A+ does not disclose call detail information over the phone during an in-bound call. A+ has implemented protections for online customer account access.

Use of CPNI for Marketing Purposes: A+ currently does not use CPNI to market products and services to customers. If A+ subsequently determines that it wants to use CPNI for marketing purposes, then it will provide the appropriate customer notification. A+ also will maintain a list of customers that wish/do not wish to receive marketing communications from the company, and will track its campaigns in accordance with the FCC's rules. A+ currently does not share CPNI with joint venture partners or independent contractors for marketing purposes.

<u>CPNI Safeguards</u>: A+ has instituted procedures to safeguard CPNI. Among other procedures, A+ has implemented procedures to authenticate its customers during an in-coming

telephone call. A+ also has implemented password protection for online accounts, and has procedures in place for lost or stolen passwords.

A+ has implemented network security measures, including, but not limited to, the use of encryption.

A+ has implemented procedures for notifying customers of certain account changes, including, changes in online passwords, changes to online accounts, changes to a back-up means of authentication, and changes to the address of record.

<u>Data Breaches</u>: A+ will notify law enforcement within seven days of the reasonable discovery of a data breach involving CPNI. A+ also will notify affected customers as permitted to do so by law. A+ will maintain a record of such notifications in accordance with applicable law.

A+ also is mindful of attempts by pretexters to gain access to CPNI, and will report on any such attempts/methods that pretexters are using when it files its annual CPNI certification.

<u>Customer Complaints</u>: A+ tracks customer complaints it receives regarding CPNI. A+ will report on those complaints in its annual CPNI certification.